

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

JULIE HODGE,)	
)	1:24-cv-02226
Plaintiff,)	
)	
and)	Judge Jorge L. Alonso
)	
NORTHEAST ILLINOIS REGIONAL)	
COMMUTER RAILROAD)	
CORPORATION, d/b/a METRA)	
)	
Defendant.)	

**PARTIES' AGREED MOTION FOR EXTENSION OF
TIME TO COMPLETE FACT DISCOVERY**

Plaintiff, JULIE HODGE, and Defendants NORTHEAST ILLINOIS REGIONAL COMMUTER RAILROAD CORPORATION, d/b/a METRA, by and through their undersigned attorneys, respectfully requests that this Court extend the deadline to complete fact discovery and in support of this motion states the following:

1. The initial Complaint in this matter was filed on March 18th, 2024.
2. On March 19, 2024, Plaintiff filed her First Amended Complaint.
3. On May 6, 2024, Plaintiff filed her Second Amended Complaint in this matter.
4. On August 9, 2024, the Defendants filed an Answer to Plaintiff's Second Amended Complaint.
5. On June 25, 2024, this Honorable Court set the deadline for the close of fact discovery as December 20, 2024.

6. On August 1, 2024, the Defendant tendered initial disclosures to Plaintiff.
7. On October 29, 2024, Plaintiff tendered initial disclosures to Defendant.
8. On August 15, 2024, the Defendant issued its First Set of Interrogatories and First Request to Produce to Plaintiff.
9. On September 29, 2024, Plaintiff issued her First Set of Interrogatories and First Request to Produce to Defendant.
10. The Parties had agreed to exchange discovery responses at the same time, but due to Plaintiff's personal and family matters, she was not able to do so.
11. Regardless, Defendant issued its responses to Plaintiff's Interrogatories and Request to Produce on December 12, 2024.
12. The Parties have agreed that Plaintiff will provide her responses on or before December 31, 2024. Defendant requests an order from the Court reflecting Plaintiff's discovery response deadline.
13. The Plaintiff has had some serious personal and family matters that has caused a delay in discovery.
14. Because Plaintiff has not provided discovery responses, it has prevented the Parties from scheduling of depositions.
15. With the approaching holidays and Plaintiff's personal and family matters, the Parties need more time to complete discovery.
16. The parties request up to and including March 31, 2025, to complete discovery.
17. No prejudice will be suffered by either party if this Honorable Court were to grant the requested extension.

WHEREFORE, JULIE HODGE, and Defendants NORTHEAST ILLINOIS REGIONAL COMMUTER RAILROAD CORPORATION, d/b/a METRA, by and through their undersigned attorneys, respectfully requests that this Court grant an extension of the deadline to complete discovery up to and including March 31, 2025.

Dated: December 16, 2024

Respectfully Submitted,

/s/Kendra D. Spearman

Kendra D. Spearman
150 S. Wacker Drive, 24th Floor
Chicago, IL 60606
312-788-2602
kendra@spearmanlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2024, I served the foregoing document upon all counsel of record by filing a copy with the Clerk of the Northern District of Illinois using the Court's electronic filing system.

/s/Kendra D. Spearman
Kendra D. Spearman
Attorney for the Plaintiff